

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**SUNTRUST MORTGAGE, INC.,
a Virginia Corporation**

Plaintiff.

v.

CIVIL ACTION NO. 3:11cv565

**LCMG, INC., d/b/a MORTGAGE MAKERS,
a South Carolina Corporation**

Defendant.

DEFENDANT'S F.R.C.P. 26(a)(1) DISCLOSURES

COMES NOW the Defendant, LCMG, INC., d/b/a MORTGAGE MAKERS,
by counsel, and makes the following disclosures:

I. Individuals likely to have discoverable information

Mike Bledsoe.

All facts.

Employees of Defendant, LCMG, Inc.

All facts.

Joseph I. Morell, Jr.

*All facts regarding Mr. Morell's application for a mortgage on
property located in Lexington, S.C.*

Employees of SunTrust Mortgage, Inc.

Shannon Collins
Group Vice President
Loan Risk & Recovery Dept.
SunTrust Mortgage, Inc.
901 Semmes Ave.
Richmond, VA 23224

All facts regarding the subject matter of the Complaint.

Beth Elliott, Underwriter
SunTrust Mortgage
9115 Harris Corners Pkwy Suite 100
Charlotte, NC 28269

All facts regarding the underwriting process and decision regarding Mr. Morell's application for a mortgage on property located in Lexington, S.C.

Employees of Equifax Information Services, LLC.

All facts regarding the subject matter of the Complaint.

Employees of Federal National Mortgage Association (Fannie Mae).

Monica Morgan
Fannie Mae Underwriting Consultant
Monica_morgan@fanniemae.com
972-773-7552

Maria Brewster
Fannie Mae Underwriting Director
Maria_b_brewster@fanniemae.com
972-773-7919

All facts regarding the mortgage loan application of Mr. Morell and Fannie Mae's purchase of the mortgage loan from SunTrust Mortgage, Inc.

Employees of United States Bankruptcy Court of the District of South Carolina.

William K. Stephenson
Bankruptcy Trustee
P.O. Box 8477
Columbia, SC 29202
(803)254-2981

All facts regarding information contained in and reported by Mr. Morell in the filing of a bankruptcy.

Employees of South Carolina State Credit Union.

All facts regarding the account information of Mr. Morell that was provided to Defendant during the mortgage loan application of Mr. Morell.

Gloria Hicks
Andy Berman

Mary Chamberlain

Tony Hummel
AIG United Guaranty Corp.
230 N. Elm St.
Greensboro NC 27401

Karen Castro
Litton Loan Servicing
4828 Loop Central Dr.
Houston TX 77210

Linda Wilmer
SunTrust

Kevin Busick
AIG Untied Guaranty Corp.
230 N. Elm St.
Greensboro NC 27401

John K. Ciobhan
Colvin Hays & Associates Inc.
778 N. Dean Rd.
Suite 200
Auburn AL 36830

Patricia Lamb
Loan Risk & Recovery Department
SunTrust Mortgage
901 Semmes Ave. , 4th Floor
Richmond VA 23224

Cathy Tate
Paige McCarthy
Tamore Brown
Deanna Patterson

***All facts regarding the investigation and decision to repurchase
& rescind the loan.***

Samantha Fleming
South Carolina State Credit Union
9221 ½ Two Notch Rd.
Columbia SC 29223

LaToya Weston

Records Clerk
800 Hoguer St.
Columbia SC 29202

CoreLogic

Sharon Mason

All facts related to verification of Mr. Morrell's deposits.

James E. Altman, Jr.
Appraiser
10628-B Broad River Road
Irmo, SC 29063

All facts related to the original appraisal of the property at issue.

Porter O. Kinard and employees of
VIP Developers Inc.
P.O. Box 9343
Columbia, S.C. 29290

All facts related to the value, marketing and sale of the property to Mr. Morrell.

Employees of AIG United Guaranty Residential Insurance Compnay, P.O. Box 60957, Charlotte, NC 28260.

All information related to the Commitment and Certificate as well as any insurance to pay the insured benefits upon Default by the Borrower.

Dennis W. Rollings or
Dennis W. Raelins
Midland Tax & Financial Services, Inc
744 Sunset Blvd. Suite 102
West Columbia, S.C. 29619

All facts related to Mr. Morell's bank accounts at South Carolina State Credit Union and Mr. Morrell's tax returns.

Marilynn Wilson
State Farm Insurance Agent
10201 Two Notch Rd.
Columbia SC 29222-4387

All facts related to Mr. Morell's property insurance policy.

Elvis Awa, Collection Agent
Margarita Gomez, FC Processor

All facts related to collection efforts regarding the property.

Wayne Kelly
Alease Braswell
Candence Royal
Tom Hruska
Bettie Hilliard
Judy Reighard
Ginger Worley
LaCretia Jones
Rhonda Carter
Ella Trimiew
Ricca Jones
John O'Connell
Ann Marie Weithers

***All facts related to the repurchase of the Morrell loan by
Suntrust from Fannie Mae.***

Employees of Merchants Credit Bureau

***All facts pertaining to Mr. Morell's credit score provided by
Merchants on March 7, 2007.***

B. Ellis
(name appears on MM0033 produced by Plaintiff)
London Rutherford
Loan Processor for LCMG, Inc.
140 Whiteford Way
Lexington, SC 29072
803-808-8100

Eric Gentry
LCMG, Inc.

Ken Ormand
Closing Attorney
625 Taylor St. Suite B
Cola, SC 29201

Brian Nick Collins
BC Appraisals
740 Bentley Dr.
Lexington, KY 29072

All facts relating to the current appraised value of the property.

Unknown persons as may be revealed in discovery.

All witnesses identified by the Plaintiff.

II. Description of documents in possession of the Defendant.

Other than those documents obtained from any Plaintiff in discovery, the Defendant has the following documents in his possession and control:

Appraisal

Defendant's Bate Stamp Nos. 000001- 000138

Defendant reserves the right to further supplement these disclosures.

LCMG, INC., d/b/a
MORTGAGE MAKERS,

/s/

Leonard A. Bennett, Esq.
VSB #37523

Attorney for Plaintiff
CONSUMER LITIGATION
ASSOCIATES, P.C.

12515 Warwick Boulevard, Suite 100
Newport News, Virginia 23606

(757) 930-3660 - Telephone

(757) 930-3662 – Facsimile

lenbennett@cox.net

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of February, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Robert Dean Perrow
Williams Mullen (Richmond)
200 South 10th Street
16th Floor
Richmond, VA 23219
(804) 420-6481
Fax: (804) 420-6507
Email: bperrow@williamsmullen.com

John Peyton McGuire Boyd, Jr.
Williams Mullen (Richmond)
200 South 10th Street
16th Floor
Richmond, VA 23219
804-783-6927
Fax: 804-783-6507
Email: mboyd@williamsmullen.com

Steven Patrick Gould
Williams Mullen (Richmond)
200 South 10th Street
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Richmond, VA 23219
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Fax: (804) 420-6507
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/s/

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